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California High-Speed Rail Authority
355 South Grand Avenue, Suite 2050
Los Angeles, California 90071

<<Transmitted via electronic mail: Burbank_LosAngeles@hsr.ca.gov >>

RE: Draft EIR for California High-Speed Rail Project-Burbank to Los Angeles Project Section

Dear California High-Speed Rail Authority:

The Mountains Recreation and Conservation Authority (MRCA) respectfully submits comments to the California High-Speed Rail Authority (Authority) on the Draft Environmental Impact Report (DEIR) for the proposed California High-Speed-Rail (HSR) Project-Burbank to Los Angeles Project Section (Project). The approximately 14-mile Project would provide HSR service between the Burbank Airport Station and Los Angeles Union Station, and provide an important new alternative mode for regional and statewide transportation. We recognize and appreciate the enormous investment and leadership required to undertake and complete this generational project linking Northern and Southern California.

The Project's proposed alignment would closely abut the largest natural habitat block along the main stem of the Los Angeles River. Within the Taylor Yard area, the proposed project abuts over a mile-long section of ecologically significant soft bottom river channel, which is only one of two unique conditions along the river directly interfacing with two State Park properties (Rio de Los Angeles State Park and the G1/Bowtie Parcel). Further downstream from the Bowtie Parcel is the 42-acre City of Los Angeles (City) owned riverfront G2 Parcel, of which the MRCA owns a 12.5-acre multipurpose easement, in perpetuity. It is also situated across the River from Lewis MacAdams Riverfront Park owned by the MRCA. The Authority only gets one chance to design and approve a project that maximizes permanent public benefit and minimizes permanent detrimental effects to the above-described regionally significant cluster of public resources. This letter highlights items the MRCA hopes to be addressed in order to approve the Project's DEIR.

The MRCA is a public agency which was established in 1985 pursuant to the Joint Powers Act and is a partnership between the Santa Monica Mountains Conservancy (SMMC), the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. The MRCA manages more than 75,000 acres of parkland and is dedicated to the preservation and management of local open space and parkland, wildlife habitat, watershed lands, and trails as well as ensuring public access to public parkland. As

advocates for the Los Angeles River, we have actively acquired and developed open spaces adjacent to the River. to undergo river restoration efforts, to develop and provide planning of River and tributary path greenways and existing parks and planned future parks, which provide habitat for Los Angeles' wildlife in an otherwise concretized city.

The MRCA with the City and California State Parks, through our "100-Acre Partnership at Taylor Yard" (Partnership) in development, are readying to begin a coordinated community-driven, design effort that will initiate phased improvements across the G1 (Bowtie) and G2 parcels to create a long-term interconnected Taylor Yard River Park, including Rio de los Angeles State Park. Any permanent encumbrance or restriction over these sites would greatly inhibit the Partnership's ability to design and implement any potential for floodplain reclamation and restoration of a natural river whose course flowed this same route, all of which are planned through a future park that is responsive to the needs of the surrounding communities. There are many factors that the Taylor Yard design process must consider, including environmental remediation, existing rail and utility easements, interior connectivity, potential relocation of the high voltage power transmission lines, and potential bridge and/or tunnel connections to the Sotomayor Arts and Sciences Magnet and Rio de los Angeles State Park. As with all MRCA and State Parks open space, the park will be designed as a day-use park that will be closed to visitors and vehicle traffic from sunset to sunrise.

The MRCA and SMMC have been monitoring the proposed Project over the last several years. We have compiled below a list of items with which we would like to share with you and hopefully will be thoroughly addressed before the DEIR is approved.

Compatibility with State Investment/Regional Serving Open Space

The State of California (through State Parks and several State grant funding agencies) and City of Los Angeles have combined to spend over \$100 million dollars in public spending to acquire 100-acres of public open space at Taylor Yard. Park development has been implemented at Rio de los Angeles State Park, and is yet early in design planning for the Bowtie and G2 parcels. The adjacency of this Project could seriously impact the level of improvements that could be successfully developed and limit the State and regional public's ability to utilize those future improvements. The Project should seek to provide compatibility with State investments and uses, while being on par to support fruition of the regional open space improvements in planning.

Impact to the Los Angeles River and Wildlife

The proposed project is located in such a publicly important zone that it must be designed to buffer, complement, and blend in with public natural and recreation areas. As mentioned previously, the surrounding public properties are investments that have been acquired over a couple of decades at the cost of millions of public dollars. Development of high-quality habitat and ecological restoration are primary goals of the improvements to be constructed at the Bowtie and G2 parcels by the Partnership, as is hydrologically reconnecting the River into these sites. These future improvements are expected to

create significant new areas of restored riparian and upland riparian habitat that will be immediately adjacent to the Project, including daylighting of several underground drains that transverse beneath the existing rail corridor before outfalling into the Los Angeles River. As train activity and construction are known to impact wildlife, the habitat that surrounds the Project must be further bolstered in order to provide greater habitat density per square meter. Construction activities and HSR operations could greatly impact success of these restoration activities and the Burbank - Los Angeles project team should work with the Partnership's planning team to ensure that impacts to habitat restoration are minimized, and assess which mitigations from the Project should be implemented into the adjacent Taylor Yard River Park.

The most obvious important project changes to include are minimum fifty-foot-wide alignment and lighting setbacks from the Los Angeles River public right-of-way, especially in the area near the Metrolink CMF. Minimum horizontal setbacks are critical to limit degradation of both existing and future restored habitat on high value urban public lands. No alternative should have less setback acreage than the above-requested "Minimum 50-Foot River and State Park Setback" alternative. At least one alternative must have twice that amount of contiguous River and State Park acreage setback to achieve a no significant biological and visual impact project. The MRCA urges a broad range of DEIR alternatives, however neither the proposed Project nor the no build alternative examine setbacks even nearing a "Minimum 50-Foot River Setback", a flaw requiring re-evaluation by the Authority for this specific alignment of the project.

Proposed Alignment Behind Metrolink CMF

The Partnership (City, State Parks, and MRCA) were recently awarded State Proposition 1 grant funds from the SMMC to construct a greenway along the edge of the Bowtie and G2 Parcels, called Paseo del Río. Planning on this project has just begun and will require several years before it can be constructed. While this is the first funded project to link improvements within public open space on the east-bank of the River in the Taylor Yard area, it should not be the last. The Project's proposed alignment west of (behind) the Metrolink CMF and occupying the narrow remainder of land adjacent to the top of River channel appears from all available documents to prevent a future down-stream extension of the river-edge Paseo del Río from the G2 Parcel linking down to the Arroyo Seco. The existing public River path on the Elysian Valley (River's west-bank) has extremely high usership that will further increase when the Downtown Los Angeles and San Fernando Valley gaps are closed linking all 51-miles of the Los Angeles River through a multi-modal path. The success to date of this commuter and recreational path have created a regional need to provide an additional corridor that alleviates crowding, safely allows multiple types of users, and helps to provide an alternate route linking Northeast Los Angeles to Downtown.

Planning documents including the City's *Los Angeles River Revitalization Master Plan* (LARRMP), County's *Los Angeles River Master Plan*, Army Corps of Engineer's *Los Angeles River Ecosystem Restoration Project*, and SMMC's *Upper Los Angeles River*

and Tributaries Revitalization Plan all identify and recommend greenways be implemented along both banks of the River, including within this stretch that links Glassell Park to Cypress Park. The proposed alignment by HSR between the Metrolink CMF and the River seems to preclude this possibility from ever happening, unless significantly cost preventative engineering designs such as a cantilevered path were to be built out over the River. However, an HSR alignment that follows the existing rail corridor to the east of the Metrolink CMF would not jeopardize future opportunities to construct an east-bank greenway that links the G2 Parcel to Cypress Park, the future Metro Downtown Bike Path and Arroyo Seco Greenway, and is the case throughout the remaining entirety of the Project. We urge you to consider shifting the alignment east of the Metrolink CMF, or at a minimum provide sufficient detail that a future Paseo del Río Greenway extension connecting downstream to the Arroyo Seco is feasible with your proposed alignment.

Taylor Yard Park Permanent Access

Open space at Taylor Yard has been envisioned for years in the LARRMP and the Ecosystem Restoration Project, not only by the City of Los Angeles, but also by the U.S. Army Corps of Engineers; however the Partnership takes it one step further by envisioning connectivity and continuity between the three properties that make up the future 100-Acre Taylor Yard River Park. This vision has been community led and we want to deliver on that, which is why the Taylor Yard landowners want to ensure that the HSR project does not negatively impact the vision but instead invests in grade improvements that connect people and wildlife between these properties. Furthermore, the Burbank - Los Angeles project team should undertake an analysis in collaboration with the State Parks, MRCA, and the City to develop a concept for a grade separation of rail through the entire Taylor Yard area.

Exhibits within the DEIR, RW-M4139 and RW-M4239, identify a Temporary Construction Easement (TCE) to be secured and built over the FedEx property at 2000 N. San Fernando Road in order to gain construction access to the Project site in the Taylor Yard area. The current access points to the Bowtie and G2 Parcels only exist from the north via Kerr Street and to the south through the Metrolink Access Road, respectively. While planning for the eventual build-out of both Parcels is underway, it is anticipated that an additional central access point to the 100-Acre Parcels is needed for the long-term development of public open space at Taylor Yard. As a Project mitigation, we recommend that you consider securing a permanent access easement (instead of a temporary one) through the FedEx property that would allow construction activities for the Project to occur, and could then remain as a permanent public accessway into the Taylor Yard River Park. The recommended Park accessway would need grade separation from the Project alignment, but represents a long-term need that has yet to be solved providing interior public access to the Taylor Yard River Park area. This opportunity to secure a permanent accessway easement could be a win-win for both the Project, the Partnership at Taylor Yard, and direct access for the community on the east side whose residents have been inadequately planned for.

Community Displacement

While new housing, in-particular affordable and low-income housing, is desperately needed throughout Los Angeles, there is a wide-spread concern that large infrastructure improvements, such as the Project, will lead to gentrification of communities surrounding the Project's alignment and displacement of current residents. As a member organization of the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative, the MRCA does not believe that affordable housing and open space protection need to be mutually exclusive; however, all infrastructure improvements including this Project, should help to meet affordable housing and protection of open space objectives outlined by LA ROSAH. The MRCA supports investments in communities which also protect the social fabric of respective neighborhoods – and strongly encourages the Authority to ensure that this Project not adversely impact the already economically impacted communities along the River.

Please address any future documents, notices, and questions to our Chief of Watershed Planning staff Brian Baldauf at the above letterhead address, by phone at (323) 221-9944 x 190, and email at brian.baldauf@mrca.ca.gov.

Sincerely,

George Lange
Chairperson